

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

El CRUZ LOGAN,	}	
Plaintiff,	}	
	}	
v.	}	
	}	
1. OKLAHOMA CITY POLICE	}	
DEPARTMENT, Ex rel.	}	CIV-23-804-F
CITY OF OKLAHOMA CITY,	}	
2. JASON HODGES,	}	
3. DANIEL PONDER,	}	
4. AUTUMN SHEETS,	}	
	}	
Defendants,	}	

**JOINT MOTION FOR PROTECTIVE ORDER**

The Plaintiff by and through counsel of record, Timothy D. Beets; The City of Oklahoma City, by and through Jeramy W. Jarman and Sherri R. Katz, Assistant Municipal Counselors, jointly make application to this Court for a Protective Order pursuant to Fed.R.Civ.P. 26(c). The Parties request the Court enter an Order deeming the following information confidential:

1. Medical, psychological, or counseling records related to any party or employee of Defendant City, and information contained in such records;
2. Performance evaluations and discipline not resulting in loss of pay, suspension, demotion or position, or termination contained in any personnel file shall be maintained as confidential under the Open Records Act, 51 O.S. § 24A.7(A); other information contained within any personnel file

shall not be confidential pursuant to the Open Records Act, 51 O.S. § 24A.7(B);

3. Social Security numbers and dates of birth of any parties or current or former employees of Defendant City;
4. Home addresses, telephone numbers, and email addresses;
5. All other information identified as confidential pursuant to Rule 5.2 of the Federal Rules of Civil Procedure; and
6. Any documents related to or contained within any investigation file in possession of the Defendant City of Oklahoma City.
7. Any audio or video recordings relevant to the claims and allegations raised in this lawsuit and in the possession of any party.

By producing documents containing the above information, Defendants do not waive any privilege concerning these documents, or any other documents that Plaintiff may attempt to discover. The City will redact social security numbers, dates of birth, beneficiary information, home addresses, banking information, and insurance information prior to production of any personnel files. Further, Defendants' do not agree that these documents or any of them are admissible.

The parties consent that an Order be entered pursuant to Fed. R. Civ. P 26(c) that provides that none of the above documents shall be disclosed to any person, organization or entity without leave of court except as follows:

- (a) In the case of tax returns, medical, psychological or counseling records the records of the contents thereof may be disclosed only to the following persons:

- (1) The Court, the Court's staff, and the staff of the Court Clerk;
  - (2) The attorneys for the Parties and the attorney's staff;
  - (3) Expert witnesses or consultants who will evaluate such records;
  - (4) Any court reporter or videographer; and
- (b) All other above-mentioned documents may be disclosed to:
- (1) The Parties;
  - (2) The attorneys for the Parties and the attorneys' staff;
  - (3) The Court, the Court's staff, and the staff of the Court Clerk;
  - (4) Any witness during the course of depositions;
  - (5) Any court reporter or videographer;
  - (6) Any person who is or reasonably may be expected to be a witness in this action, and
  - (7) Any person who reasonably would need to see such materials in order to give testimony or information related to the case, to form opinions, or to serve as a consultant with regard to issues in the action.

Further, the attorneys of record for the parties shall be responsible to ensure that this Protective Order is honored and enforced. Personnel records of third parties may be filed provided that the names of the third parties and identifying information (except for initials or similar designations) are redacted. Further, if any of these documents are to be filed in this case they need not generally be filed or presented under seal.

WHEREFORE, premises considered, the parties pray a Protective Order be entered as requested herein.

**AGREED:**

/s/ Timothy D. Beets  
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